

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELG, a minor by Parent and
Next Friend LATOREYA TILL,

Plaintiff,

vs.

JUDGE KENNETH KING,
individually; UNIVERSAL
PROTECTION SERVICES d/b/a
ALLIED UNIVERSAL SECURITY
SERVICES and/or ALLIED
UNIVERSAL SECURITY SERVICES,
LLC; KEITH TAYLOR, individually;
and CATHY R. GREER-FORTE
individually,

Defendants.

Civil No. 24-cv-12195

ANSWER TO COMPLAINT

Honorable David M. Lawson

ANSWER TO AMENDED COMPLAINT

Defendant Hon. Kenneth King, by and through his attorneys, THE PERKINS LAW GROUP, PLLC, and TODD RUSSELL PERKINS hereby submits his Answer to Plaintiff's Complaint, and state as follows:

JURISDICTION

1. Deny.
2. Admit.
3. Admit.
4. Admit.

5. Deny.

6. Paragraph 6 states a legal conclusion, and neither requires an admittance or denial.

PARTIES AND VENUE

7. Deny.

8. Paragraph 8 neither requires an admittance or denial.

9. Admit.

10. Defendant lacks knowledge of the allegations contained in paragraph 10, and therefore denies.

11. Defendant lacks knowledge of the allegations contained in paragraph 11, and therefore denies.

12. Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

13. Deny.

14. Admit.

15. Admit

FACTUAL ALLEGATIONS

16. Admit.

17. Admit.

18. Defendant lacks knowledge of the allegations contained in paragraph 18, and therefore denies.

19. Admit.

20. Admit.

21. Deny as to the classification as Defendant King as a lecturer.

22. Defendant lacks knowledge of the allegations contained in paragraph 22, and therefore denies.

23.. Defendant lacks knowledge of the allegations contained in paragraph 23, and therefore denies.

24. Defendant lacks knowledge of the allegations contained in paragraph 24, and therefore denies.

25. Defendant lacks knowledge of the allegations contained in paragraph 25, and therefore denies.

26. Admit.

27. Deny.

28. Deny.

29. Deny as to the classification of “leaving the bench”.

30. Deny.

31. Deny.

32. Defendant lacks knowledge of the allegations contained in paragraph 32, and therefore denies.

33. Defendant lacks knowledge of the allegations contained in paragraph 33, and therefore denies.

34. Defendant lacks knowledge of the allegations contained in paragraph 34, and therefore denies.

35. Admit.

36. Deny.

37. Deny.

38. Deny.

39. Deny.

40. Deny.

41. Defendant lacks knowledge of the allegations contained in paragraph 41, and therefore denies.

42. Defendant lacks knowledge of the allegations contained in paragraph 42, and therefore denies.

43. Deny.

44. Deny.

45. Deny.

46. Deny.

47.Deny.

48.Deny.

49.Deny.

50.Deny.

51.Deny.

52.Deny.

53.Deny.

54.Deny.

55.Deny.

DUE PROCESS

56.Paragraph 55 neither requires an admittance or denial.

57.Paragraph 56 states a legal conclusion and leaves Plaintiff to her proofs.

58.Paragraph 57 states a legal conclusion and leaves Plaintiff to her proofs.

59.Paragraph 58 states a legal conclusion and leaves Plaintiff to her proofs.

60.Paragraph 59 states a legal conclusion and leaves Plaintiff to her proofs.

61.Paragraph 60 states a legal conclusion and leaves Plaintiff to her proofs.

62.Paragraph 61 states a legal conclusion and leaves Plaintiff to her proofs.

63.Deny.

64.Deny.

65.Deny.

66.Paragraph 66 states a legal conclusion and leaves Plaintiff to her proofs.

67.Deny.

68.Deny.

69.Paragraph 69 states a legal conclusion and leaves Plaintiff to her proofs.

70.Deny.

71.Deny.

72.Paragraph 72 states a legal conclusion and leaves Plaintiff to her proofs.

73.Deny.

74.Deny.

75.Deny.

76.Deny.

77.Deny.

78.Deny.

79.Paragraph 79 states a legal conclusion and leaves Plaintiff to her proofs.

80.Deny.

81.Deny.

82.Deny.

83.Deny.

84.Deny.

85.Deny.

86.Deny.

87.Deny.

88.Deny.

89.Deny.

90.Deny.

91.Deny.

92.Deny.

93.Deny.

LACK OF IMMUNITY

94.Paragraph 94 neither requires an admittance or denial.

95.Paragraph 95 neither requires an admittance or denial.

96.Paragraph 96 states a legal conclusion and leaves Plaintiff to her proofs.

97.Paragraph 97 states a legal conclusion and leaves Plaintiff to her proofs.

98.Paragraph 98 states a legal conclusion and leaves Plaintiff to her proofs.

99.Paragraph 99 states a legal conclusion and leaves Plaintiff to her proofs.

100. Paragraph 100 states a legal conclusion and leaves Plaintiff to her proofs.

101. Paragraph 101 states a legal conclusion and leaves Plaintiff to her proofs.

102. Paragraph 102 states a legal conclusion and leaves Plaintiff to her proofs.

103. Admit.

104. Paragraph 104 neither requires an admittance or denial.

105. Paragraph 105 neither requires an admittance or denial.

106. Deny.

107. Paragraph 107 states a legal conclusion and leaves Plaintiff to her proofs.

108. Deny.

109. Deny.

110. Deny.

111. Deny.

112. Deny.

113. Deny.

114. Deny.

115. Deny.

116. Deny.

117. Deny.

118. Deny.

**COUNT I – DEFENDANT JUDGE KENNETH KING – MALICIOUS
PROSECUTION IN VIOLATION OF THE 4TH AMENDMENT**

119. Paragraph 119 neither requires an admittance or denial.

120. Deny.

121. Paragraph 121 states a legal conclusion and leaves Plaintiff to her proofs.

122. Paragraph 122 states a legal conclusion and leaves Plaintiff to her proofs.

123. Deny.

124. Deny.

125. Deny.

126. Deny.

127. Deny.

128. Deny.

**COUNT II -- DEFENDANT JUDGE KENNETH KING – UNLAWFUL
ARREST AND INCARCERATION IN VIOLATION OF THE 4TH
AMENDMENT**

129. Paragraph 129 neither requires an admittance or denial.

130. Paragraph 130 states a legal conclusion and leaves Plaintiff to her proofs.

131. Paragraph 131 states a legal conclusion and leaves Plaintiff to her proofs.

132. Paragraph 132 states a legal conclusion and leaves Plaintiff to her proofs.

133. Paragraph 133 states a legal conclusion and leaves Plaintiff to her proofs.

134. Deny.

135. Deny.

136. Deny.

137. Deny.

138. Deny.

139. Deny.

140. Deny.

141. Deny.

142. Deny.

143. Deny.

**COUNT III -- DEFENDANT JUDGE KENNETH KING – INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS**

144. Paragraph 144 neither requires an admittance or denial.

145. Deny.

146. Deny.

147. Deny.

148. Deny.

149. Deny.

**COUNT IV-DEFENDANT JUDGE KENNETH KING
– INVASION OF PRIVACY**

150. Paragraph 150 neither requires an admittance or denial.

151. Deny.

152. Deny.

153. Deny.

154. Deny.

155. Deny.

156. Deny.

157. Deny.

158. Deny.

159. Deny.

160. Deny.

161. Deny.

162. Deny.

**COUNT V – DEFENDANT JUDGE KENNETH KING – FALSE ARREST
AND IMPRISONMENT**

163. Paragraph 163 neither requires an admittance or denial.

164. Deny.

165. Deny.

166. Deny.

167. Deny.

168. Deny.

**COUNT VI – DEFENDANTS JOHN DOE &
JANE ROE COURT OFFICERS – FOURTH AMENDMENT UNLAWFUL
SEIZURE & DETENTION**

169. Paragraph 169 neither requires an admittance or denial.

170. Paragraph 170 states a legal conclusion and leaves Plaintiff to her proofs.

171. Paragraph 171 states a legal conclusion and leaves Plaintiff to her proofs.

172. Paragraph 172 states a legal conclusion and leaves Plaintiff to her proofs.

173. Paragraph 173 states a legal conclusion and leaves Plaintiff to her proofs.

174. Deny.

175. Deny.

176. Deny.

177. Deny.

178. Deny.

179. Deny.

180. Defendant lacks knowledge of the allegations contained in paragraph 180,
and therefore denies

181. Defendant lacks knowledge of the allegations contained in paragraph 181, and
therefore denies

182. Deny.

183. Deny.

184. Deny.

185. Deny.

186. Deny.

187. Deny.

**COUNT VII – DEFENDANTS JOHN DOE &
JANE ROE COURT OFFICERS – FALSE ARREST & IMPRISONMENT**

188. Paragraph 188 neither requires an admittance or denial.

189. Deny.

190. Deny.

191. Deny.

192. Deny.

193. Deny.

194. Deny.

**COUNT VIII -- DEFENDANT UNIVERSAL – VICARIOUS LIABILITY
FOR STATE LAW TORTS**

195. Paragraph 195 neither requires an admittance or denial.

196. Deny.

197. Deny.

REQUESTED RELIEF

Defendant humbly request this court find no cause of action and dismiss Plaintiff's Complaint in its entirety.

Dated: January 27, 2025

/s/Todd R. Perkins

TODD RUSSELL PERKINS (P55623)

THE PERKINS LAW GROUP, PLLC

Attorney for Defendant

615 Griswold, Suite 400

Detroit, Michigan 48226

(313) 964-1702

tperkins@perkinslawgroup.net

AFFIRMATIVE DEFENSES AND OTHER DEFENSES

Defendant Kenneth King states as follows for his affirmative defenses to Plaintiff's First Amended Complaint:

1. Plaintiff's Complaint fails to state a claim against Defendant upon which relief can be granted.
2. Plaintiff's claims are barred by the doctrine of absolute judicial immunity.
3. To the extent it alleges a violation arising under the Constitution of the United States for alleged violations of the Fourth Amendment, Plaintiff's Complaint fails to state a claim against Defendant upon which relief may be granted and there is no genuine issue of material fact.
4. That the sole proximate cause, or at least a contributing cause, of the damages and/or injuries complained of by Plaintiff were of her own wrongful conduct, negligence, or comparative fault.
5. Plaintiff's claims fail as a matter of law because Plaintiff did not suffer any constitutional deprivation.
6. In all respects, Defendant's actions were in good faith, reasonable, proper, and legal.
7. Any injury suffered by Plaintiff was proximately caused by her own wrongful conduct.

8. That the sole proximate cause, or at least a contributing cause, of the damages and/or injuries complained of by Plaintiff was the actions of third parties.

Defendant reserves the right to assert additional affirmative defenses as they are revealed in the course of this proceeding.

Dated: January 27, 2025

/s/Todd R. Perkins

TODD RUSSELL PERKINS (P55623)

THE PERKINS LAW GROUP, PLLC

Attorney for Defendant

615 Griswold, Suite 400

Detroit, Michigan 48226

(313) 964-1702

tperkins@perkinslawgroup.net

CERTIFICATE OF SERVICE

I, Todd Perkins, hereby certify that on January 27, 2025, I filed the foregoing Answer, Affirmative Defenses and Reliance on a Jury Demand, to Clerk of Court and all parties of record via the electronic filing system.

Respectfully Submitted,

PERKINS LAW GROUP, PLLC

/s/: Todd Perkins

TODD RUSSELL PERKINS

Attorney for Defendant

615 Griswold Street, Suite 400

Detroit, Michigan 48226

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